

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IRENE SIMMONS AND RODELL)	
SANDERS, for themselves and others)	Case No. 1:20-CV-1128
similarly situated,)	
)	
Plaintiffs,)	Judge John J. Tharp Jr.
)	
v.)	Magistrate Judge Jeannice W. Appenteng
)	
MOTOROLA SOLUTIONS, INC., and)	
VIGILANT SOLUTIONS, LLC,)	
)	
Defendants.)	

JOINT STATUS REPORT

Under the Court’s October 1, 2024 Minute Entry (Dkt. 165), Plaintiffs Irene Simmons and Rodell Sanders and Defendants Motorola Solutions, Inc. and Vigilant Solutions, LLC, through their respective counsel, respectfully submit this joint status report.

Since their last status report, the Parties have met with retired Judge Sidney I. Schenkier and were able to resolve the final remaining open issue in the draft settlement agreement through further mediation. The Parties should have a final executed settlement agreement within 14 days. Relatedly, the Parties continue to work with a proposed claims administrator to address notice issues involved in this case. In addition, as previously mentioned, Plaintiffs have filed a class action complaint in Cook County Circuit Court, *Simmons v. Motorola Solutions, Inc.*, 2024L010142 (Cook Cty. Cir. Ct.) (“State Case”), where there is subject matter jurisdiction over all of Plaintiffs’ BIPA claims. Pursuant to the forthcoming Settlement Agreement, Plaintiffs will promptly move for preliminary approval of the Settlement Agreement in the State Case.

Therefore, the Parties respectfully request that the Court continue to stay ruling on Defendants' pending motion for summary judgment (Dkt. 111) and schedule a due date for another status report in 30 days.

DATED: October 30, 2024

PLAINTIFFS IRENE SIMMONS and
RODELL SANDERS

/s/ Michael I. Kanovitz
One of their attorneys

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Respectfully submitted,

DEFENDANTS MOTOROLA SOLUTIONS,
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